

## **EXHIBIT G-2**

George J. Gerro (SBN 325168)  
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Burbank, CA 91502  
(818) 845-3030

## *Self-Represented*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, BURBANK COURTHOUSE**

**GEORGE GERRO**, an individual,

) CASE NO.: 20BBCV00308

Plaintiff,

) **ASSIGNED FOR ALL PURPOSES TO:**  
 )           **Honorable Frank M. Tavelman**  
 )           **Department A**

BLOCKFI LENDING LLC, a Delaware limited liability company; SCRATCH SERVICES, LLC, a Delaware limited liability company; and DOES 1 through 100,

) **STIPULATION TO DISMISS  
DEFENDANTS BLOCKFI LENDING,  
LLC; BLOCKFI, INC.; [PROPOSED]  
ORDER THEREON**

## Defendants.

1           WHEREAS, this action was stayed due to the bankruptcy of Defendant BlockFi Lending  
2 LLC (“BlockFi”);

3           WHEREAS, on August 19, 2024, Plaintiff George Gerro (“Gerro”) filed a request for  
4 dismissal without prejudice of Defendant BlockFi Lending LLC (“BlockFi”), the only BlockFi  
5 affiliated entity named in said action;

6           WHEREAS, on August 19, 2024, the above-entitled court entered dismissal of BlockFi;

7           WHEREAS, BlockFi requests that Gerro dismiss BlockFi with prejudice;

8           WHEREAS, the subject matter of the above-entitled action is still pending before the  
9 United States Federal Court of Appeals for the Third Circuit, so dismissal with prejudice is not  
10 intended to constitute *res judicata* of the claims contained herein;

11           **IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

- 12           1. BlockFi is dismissed with prejudice, but such dismissal shall not be claim preclusive.
- 13           2. BlockFi represents that BlockFi will not argue in any forum or tribunal that its dismissal  
14 necessitates claim preclusion, and Gerro reasonably relies upon BlockFi’s representation.
- 15           3. No third-parties or privies of BlockFi may rely upon this dismissal as being claim  
16 preclusive.
- 17           4. This stipulation shall not in any manner undermine the power, jurisdiction, or ability of  
18 the United States Bankruptcy Court for the District of New Jersey, the United States District Court  
19 of New Jersey, or the United States Court of Appeals for the Third Circuit to render appropriate  
20 relief upon Gerro’s claims which are currently pending, or may be pending in the future, before  
21 those courts. Said courts shall retain the power to abstain, defer, or otherwise allow this Court to  
22 decide any remaining issues between the parties.

23  
24 DATED: September \_\_\_, 2024

HAYNES AND BOONE, LLP

25  
26 By: \_\_\_\_\_  
27

28  
Mark Erickson  
Attorneys for Defendant BLOCKFI  
LENDING, LLC

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2 DATED: September \_\_\_\_, 2024

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4 By:

5 George J. Gerro  
Self-Represented

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7 **GOOD CAUSE APPEARING THEREFOR,**

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9 **IT IS SO ORDERED.**

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DATED: \_\_\_\_\_

HON. FRANK M. TAVELMAN  
JUDGE OF THE SUPERIOR COURT